9:16-21 21:7-10 25:1-6 5:19-20 21:17-23 12:17-13:2 Page/Line Cite PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU and Counter-Designations Defendants' Objections Defendants' Objections Plaintiffs' Responses to Counter-Designations and Objections to (Counter-Designations in italicized text) Deposition June 11, 2005 18:3-6 20:21-23 18:18-22 Defendants' Cross Examination Plaintiffs' Objections and Counter-Designations Counter-Designations Plaintiffs' Objections and Objections to Responses to Defendants'

PLAIN	PLAINTIFFS? DIRECT AND DEFENDANTS? CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU (Counter-Designations in italicized text) Deposition June 11, 2005	EFENDANTS' CROSS EXAMINATION DE (Counter-Designations in italicized text) Deposition June 11, 2005	XAMINATION DESIGns in italicized text) ne 11, 2005	NATIONS OF ABEL O	GBORU
Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
25:11-21					
25:24-25					
	•		30:2 (beginning with "Where") - 30:6		
30:17-31:7					
31:22-24				- Colonia de la colonia de	
32:4-5				- CAMBRIAN	
41:5-8	,			ALIENTY AND	
41:11-13				i panagrap	
42:18-20					

	(Counter-Designations in italicized text) Deposition June 11, 2005	(Counter-Designations in italicized text) Deposition June 11, 2005	ns in italicized text) me 11, 2005		
Page/Line Cite	Defendants? Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter-Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
44:22-45:3					
51:5-6					
51:8-11					
52:13-14			·		
52:16					
56:16-18					A. A
57:5-14		•	•		-
61:19-62:8				2/2	
			62:13-15	Beyond the scope of plaintiffs' original designation, and the	This designation is well within the scope of plaintiffs' direct,

	war kilometri da bari	To the second se	 	_
	Page/Line Cite		62:17 ("As of")– 20	6 17 17
	Defendants' Objections and Counter-Designations		62:17: Defendants object to the omission of "But" from the beginning of the sentence because it is incomplete and misleading. FRE 106, 403.	
(Counter-Designations in italicized text) Deposition June 11, 2005	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations		bject variation of the fact of	
ns in italicized text) ne 11, 2005	Defendants' Cross Examination			
	Plaintiffs' Objections and Counter- Designations	answer is not responsive to the question asked.		
	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations	including the testimony designated by plaintiffs at 62:3-8 and 62:17-20. The witness' answer is directly responsive to the question.		

- 5 -

PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU (Counter-Designations in italicized text)

		(Counter-Designations in italicized text) Deposition June 11, 2005	ns in italicized text) ne 11, 2005		
Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
64:10-16 (beginning, "What did you")					
64:21-25					
		·	65:6-10	This designation is beyond the scope of plaintiffs' direct designation, and the statement is hearsay.	This designation is well within the scope of plaintiffs' direct, which inquires into the details surrounding this witness' experiences during the incident. It is closely related to many of plaintiffs' designations. The only out-of-court statement contained in this testimony is offered for the non-

Page/Line Cite and Counter-Designations and Objections to Counter-Designations [Associated and Counter-Designations and Objections to Counter-Designations] [Associated and Objections to Counter-Designations] [Associated and Counter-Designation and Counter-Designations] [Associated and Counter-Designation and Counter-Designat
58:6-8 58:6-8 68:13-14 68:17-19 68:24-25 69:5-7 69:11-14
68:6-8 68:13-14 68:17-19 68:17-19 68:24-25 69:5-7 69:11-14 69:11-14
68:6-8 68:13-14 68:13-14 68:17-19 68:24-25 69:5-7 69:11-14 69:11-14
68:13-14 68:17-19 68:24-25 69:5-7 69:11-14 69:11-14
68:17-19 68:24-25 69:5-7 69:11-14 70:5-8
68:24-25 69:5-7 69:11-14
69:5-7 69:11-14 70:5-8
69:11-14 70:5-8
70:5-8

76:10-12	71:20-22		70:18-23		Page/Line Cite		THE PERSON NAMED IN COLUMN NAM
				·			PLAIN
Defendants object that plaintiffs' omission of 75:9-12 leaves the designated question re "he" incomplete and misleading. FRE 106 403.					Defendants' Objections and Counter-Designations		PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU
t that on of on re and 106 White American					Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	(Counter-Designations in italicized text) Deposition June 11, 2005	FENDANTS' CROSS EX
		70:24-71:1		70:12-17	Defendants? Cross Examination	ns in italicized text) ne 11, 2005	KAMINATION DESIG
				And the second s	Plaintiffs' Objections and Counter- Designations		SNATIONS OF ABEL O
					Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations	·	GBORU

Page/Line Cite PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU and Counter-Designations Defendants' Objections Defendants' Objections Plaintiffs' Responses to Counter-Designations (Counter-Designations in italicized text) and Objections to Deposition June 11, 2005 77:11-20 Defendants' Cross Examination designation. plaintiffs' direct beyond the scope of and this designation is Randy told Ogburu, Hearsay as to what Plaintiffs' Objections and Counter-Designations witness' visit to during the incident. witness' experiences surrounding this which inquires into of plaintiffs' direct, well within the scope statement. To the out-of-court visit. This testimony 22 regarding the designation at 76:19does not include any is not hearsay, as it the details This designation is extent that any such Parabe with this Compare plaintiffs' the purpose for that testimony regarding Counter-Designations Plaintiffs' Objections and Objections to Responses to Defendants?

			AND THE RESIDENCE OF THE STATE
85:25-86:5	84:23		Page/Line Cite
			Defendants' Objections and Counter-Designations
			Deposition June 11, 2005 Plaintiffs' Responses to Defendant Defendants' Objections and Objections to Counter-Designations
		84:22	ne 11, 2005 Defendants' Cross Examination
	-	This designation is beyond the scope of plaintiffs' direct designation, and is irrelevant because the witness simply testifies as to something he can't remember.	Plaintiffs' Objections and Counter- Designations
		Not only is this designation within the scope of direct, it is essential for understanding the plaintiffs' direct designations at 84:15-18 and 84:23. Plaintiffs' assertion that this testimony is irrelevant is frivolous. The testimony is crucial to avoid jury confusion.	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations

		_					-				
	Page/Line Cite										
	Defendants' Objections and Counter-Designations				·		·				
Deposition June 11, 2005	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations					·					
me 11, 2005	Defendants' Cross Examination	86:19-23	87:14-15	87:20-22							
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Plaintiffs' Objections and Counter- Designations			Lacks foundation, calls for speculation.	-		•		-		
	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations			There is sufficient foundation for the witness to testify that the technicians at Mahu would	normally be able to fix the problem if they had the proper	had worked in the oil	industry for 35 years (9:18-21), during	positions such as	field supervisor	responsible for oil	Oroganom mon research

Page/Line Cite PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU and Counter-Designations Defendants' Objections Defendants' Objections Plaintiffs' Responses to Counter-Designations and Objections to (Counter-Designations in italicized text) Deposition June 11, 2005 Defendants' Cross Examination speculation. Lacks foundation, Plaintiffs' Objections and Counter-Designations observations. speculative; rather it normally be able to witness to testify that personal experience and industry knowledge, is based on his testimony is not (25:16-17). His Counter-Designations they had the proper Mabu would foundation for the Plaintiffs' Objections tools. This witness fix the problem if the technicians at There is sufficient (9:18-21), during industry for 35 years which he held had worked in the oil and Objections to Responses to Defendants'

PLAI	PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU (Counter-Designations in italicized text)	EFENDANTS' CROSS EXAMINATION DE (Counter-Designations in italicized text)	KAMINATION DESIC s in italicized text)	NATIONS OF ABEL O	GBORU
		Deposition June 11, 2005	ne 11, 2005		
Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants? Responses to Plaintiffs? Objections and Objections to Counter-Designations
					positions such as field supervisor responsible for oil
					production activities (25:16-17). His
					speculative; rather it
					is based on his industry knowledge,
					experience and personal
					observations.
88:13-89:1					
89:19-23					
90:1-2					
90:5-6					

PLAIN	PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU	EFENDANTS' CROSS E	XAMINATION DESIG	GNATIONS OF ABEL O	GBORU
		(Counter-Designations in italicized tex	ns in italicized text)		
		Deposition June 11, 2005	ine 11, 2005		
Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
90:16-18					
			93:17	This designation is beyond the scope of	This designation is well within the scope of plaintiffs' direct
				designation and irrelevant.	which inquires into the details
				2	surrounding this witness' experiences
*					It is closely related to
					many of plaintiffs' designations and is
					understanding this
<u>.</u>					witness' conduct
			÷		well as CNL's state
					of mind regarding the hostage-taking
		-			

	•	Deposition June 11, 2005	me 11, 2005		
Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
					incident.
			93:19-21	This designation is beyond the scope of plaintiffs' direct designation and	This designation is well within the scope of plaintiffs' direct, which inquires into
				шелечань.	surrounding this
				0 7	witness' experiences during the incident.
					many of plaintiffs'
					designations and is relevant to
					understanding this witness' conduct
					during the incident as well as CNL's state
					of mind regarding the hostage-taking
					incident.

Page/Line Cite	
Defendants' Objections and Counter-Designations	
Plaintiffs' Responses to Defendant Defendants' Objections and Objections to Counter-Designations	
Defendants' Cross Examination	94:16-95:5
Plaintiffs' Objections and Counter- Designations	This designation is beyond the scope of plaintiffs' direct designation, irrelevant, and Oburu and Randy's statements are hearsay.
Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations	This designation is well within the scope of plaintiffs' direct, which inquires into the details surrounding this surrounding the incident. It is closely related to many of plaintiffs' designations and is relevant to understanding this witness' conduct during the incident as well as CNL's state of mind regarding the hostage-taking. The only out-of-court statements contained in this testimony are

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		Page/Line Cite	PLAI
		Defendants' Objections and Counter-Designations	PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU (Counter-Designations in italicized text) Deposition June 11, 2005
		Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	DEFENDANTS' CROSS EXAMINATION DE (Counter-Designations in italicized text) Deposition June 11, 2005
95:8-11		Defendants' Cross Examination	EXAMINATION DESIGNATION DE LA CONTRA D
This designation is beyond the scope of plaintiffs' direct designation and irrelevant.		Plaintiffs' Objections and Counter- Designations	GNATIONS OF ABEL (
Well within the scope of plaintiffs' direct, which inquires into the details surrounding this witness' experiences during the incident. It is closely related to many of plaintiffs' designations and is relevant to understanding this witness' conduct during the incident as	offered for the non- hearsay purpose of showing their effect on the hearer and the speaker's state of mind.	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations)GBORU

	Page/Line Cite
	Defendants' Objections and Counter-Designations
	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations
8:8-24	Defendants' Cross Examination
beyond the scope of plaintiffs' direct designation and irrelevant.	Plaintiffs' Objections and Counter-Designations
well within the scope of plaintiffs' direct, which inquires into the details surrounding this witness' experiences during the incident. It is closely related to many of plaintiffs' designations and is relevant to understanding this witness' conduct during the incident as	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations well as CNL's state of mind regarding the hostage-taking incident.

			Deposition June 11, 2005	me 11, 2005		
	Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
P***						hostage-taking incident.
	-	· · · · · · · · · · · · · · · · · · ·		99:13-15		
	99:21-24					
				99:25-100:13	This designation is beyond the scope of plaintiffs' direct designation.	The beyond-the- scope objection is frivolous. This testimony discusses
					0/2	the same subject as the testimony plaintiffs designated at 99:21-24.
-	100:14-17		i i i i i i i i i i i i i i i i i i i			
-				100:18-20	This designation is beyond the scope of	The beyond-the- scope objection is

	Page/Line Cite
	Defendants' Objections and Counter-Designations
	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations
	Defendants' Cross Examination
plaintiffs' direct designation. The answer is also misleading and prejudicial under Rule 403 because it creates the impression that Simeon told Ogburu that the Ilaje had made threats before he left Escravos, but it's clear from 100:21-23 that he couldn't communicate with Simeon after Ogburu went to Escravos, and 101:2-5 makes clear that before Ogburu went to Escravos, he never heard any threats from the Ilaje.	Plaintiffs' Objections and Counter- Designations
frivolous. This testimony concerns the same subject matter as the immediately preceding testimony at 100:14-17, which has been designated by plaintiffs, as well as many of plaintiffs' other designations for this witness. The Rule 403 objection fares no better. Plaintiffs' suggestion that the testimony is misleading is entirely without merit. The testimony is clear and, moreover, plaintiffs' arguments at most would go to	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations

•		, ,			
Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
					the weight of the testimony, not its admissibility.
101:2-5 (only "Yes.")					
104:13-17					
107:3-7					,
107:10-14					
			114:10-16	This designation is beyond the scope of plaintiffs' direct	This designation is well within the scope of plaintiffs' direct,
· · · · · · · · · · · · · · · · · · ·				irrelevant.	which inquires into the details surrounding this

Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants? Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
					witness' experiences during the incident. It is closely related to many of plaintiffs' designations and is relevant to understanding this witness' conduct during the incident and CNL's state of mind regarding the hostage-taking incident.
			125:4-7	This designation is beyond the scope of plaintiffs' direct designation and	This designation is well within the scope of plaintiffs' direct, which inquires into
				testimony.	surrounding this witness' experiences during the incident.

PLAI	Page/Line Cite			
PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION I (Counter-Designations in italicized te: Deposition June 11, 2005	Defendants' Objections and Counter-Designations			·
EFENDANTS' CROSS EXAMINATION DE (Counter-Designations in italicized text) Deposition June 11, 2005	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations		٠	
XAMINATION DESIGNS in italicized text) me 11, 2005	Defendants' Cross Examination		125:19-20	125:23-126:3
xt)	Plaintiffs' Objections and Counter- Designations	•		This designation is beyond the scope of plaintiffs' direct designation, waste of time and irrelevant.
GBORU	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations	It is closely related to many of plaintiffs' designations and is not cumulative of prior designated testimony.		This designation is well within the scope of plaintiffs' direct, which inquires into the details surrounding this witness' experiences during the incident. It is closely related to

 PLAI	PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION E (Counter-Designations in italicized tex Deposition June 11, 2005	(Counter-Designations in italicized text Deposition June 11, 2005		()	
Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
					designation is not a waste of time.
			126:6-7		
			135:13-16	This designation is beyond the scope of plaintiffs' direct	This designation is well within the scope of plaintiffs' direct,
				designation, waste of time and irrelevant.	which includes numerous designations
				22	See e.g., 42:18-20; 44:22-45:3; 52:13-16; 56:16-18; 61:19-62:8.
		·			the platform is highly relevant.
			135:20-23	This designation is beyond the scope of	This designation is well within the scope

Page/Line Cite PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU and Counter-Designations Defendants' Objections Plaintiffs' Responses to Defendants' Objections Counter-Designations and Objections to (Counter-Designations in italicized text) Deposition June 11, 2005 136:1-6 Defendants' Cross Examination plaintiffs' direct time and irrelevant. designation, waste of time and irrelevant. designation, waste of plaintiffs' direct beyond the scope of This designation is Plaintiffs' Objections and Counter-Designations which includes of plaintiffs' direct, numerous which includes of plaintiffs' direct, well within the scope waste of time. testimony is not a relevant. This the platform is highly Simeon's location on 56:16-18; 61:19-62:8. 44:22-45:3; 52:13-16; See e.g., 42:18-20; regarding Simeon. designations Counter-Designations numerous This designation is designations Plaintiffs' Objections and Objections to Responses to Defendants'

regarding Simeon.

See e.g., 42:18-20;

(Counter-Designations in italicized text)

				Page/Line Cite	Defendants' Objections and Counter-Designations	(Counter-Designations in italicized text) Deposition June 11, 2005 Plaintiffs' Responses to Defendants' Cros and Objections to Counter-Designations 136:22-23	ns in italicized text) une 11, 2005 Defendants' Cross Examination 136:22-23	Plaintiffs' Objections and Counter- Designations This designation is beyond the scope of plaintiffs' direct designation, waste of time and irrelevant
136:22-23	130:22-23	136:22-23	136:22-23	Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' (Examinati	On On
					·		136:22-23	

		Page/Line Cite
		Defendants' Objections and Counter-Designations
		Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations
138:3-5	137:1-6	Defendants' Cross Examination
This designation is beyond the scope of	This designation is beyond the scope of plaintiffs' direct designation, waste of time and irrelevant.	Plaintiffs' Objections and Counter- Designations
This designation is well within the scope of plaintiffs' direct.	waste of time. This designation is well within the scope of plaintiffs' direct, which includes numerous designations regarding Simeon. See e.g., 42:18-20; 44:22-45:3; 52:13-16; 56:16-18; 61:19-62:8. Simeon's location on the platform is highly relevant. This testimony is not a waste of time.	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations

- 28 -

PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU

(Counter-Designations in italicized text)

		Page/Line Cite	
		Defendants' Objections and Counter-Designations	
		Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Deposition June 11, 2005
138:7-10		Defendants' Cross Examination	He 11, 2005
 This designation is beyond the scope of plaintiffs' direct designation, waste of time and irrelevant.	designation, waste of time and irrelevant.	Plaintiffs' Objections and Counter- Designations	
This designation is well within the scope of plaintiffs' direct, which includes testimony regarding this witness'	which includes testimony regarding this witness' discussions with Simeon (who was on the Parabe platform during the incident). See e.g., 42:18-20; 44:22-45:3; 52:13-16; 56:16-18; 61:19-62:8. It is closely related to many of plaintiffs' designations and is highly relevant.	Defendants? Responses to Plaintiffs' Objections and Objections to Counter-Designations	

Simeon (who was on the Parabe platform during the incident). See e.g., 42:18-20; 44:22-45:3; 52:13-16; 56:16-18, 61:19-62:8. It is closely related to many of plaintiffs' designation is beyond the scope of plaintiffs' direct, designation, waste of time and irrelevant. This designation is beyond the scope of plaintiffs' direct, designation, waste of this witness' this witness' this witness' this witness' the Parabe platform the Parabe platform	Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations
			-		
				138:12	This designation is beyond the scope of plaintiffs' direct designation, waste of time and irrelevant.

(Counter-Designations in italicized text)

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Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
					44:22-45:3; 52:13-16; 56:16-18; 61:19-62:8. It is closely related to many of plaintiffs' designations and is highly relevant.
			152:13-20	This designation is beyond the scope of plaintiffs' direct designation, and cumulative of previous testimony.	This testimony describes the witness' visit to Parabe during the incident and is entirely within the scope of plaintiffs' direct on the same topic. See e.g., 76:10-12; 76:19-22. It is not cumulative.
			152:25	This designation is beyond the scope of plaintiffs' direct	This testimony describes the witness' visit to Parabe during

		Deposition June 11, 2005	ne 11, 2005		
Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
				designation, and cumulative of previous testimony.	the incident and is wholly within the scope of plaintiffs' direct on the same
					topic. See e.g., 76:10-12; 76:19-22. It is not cumulative.
			153:3-4	This designation is beyond the scope of plaintiffs' direct	This testimony describes the witness' visit to Parabe during
				designation, irrelevant and a waste of time.	the incident and is wholly within the scope of plaintiffs'
				2	direct on the same topic. See e.g., 76:10-12; 76:19-22. It is not cumulative.
			153:7	This designation is beyond the scope of	This testimony describes the witness

	·				
topic. See e.g., 76:10-12; 76:19-22. It is not cumulative.	2				
wholly within the scope of plaintiffs'	and a waste of time.				
This testimony describes the witness' visit to Parabe during	This designation is beyond the scope of plaintiffs' direct	155:6-9			
topic. See e.g., 76:10-12; 76:19-22. It is not cumulative.					
wholly within the scope of plaintiffs' direct on the same	and a waste of time.				
visit to Parabe during the incident and is	plaintiffs' direct designation, irrelevant				
Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations	Plaintiffs' Objections and Counter- Designations	Defendants' Cross Examination	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Objections and Counter-Designations	Page/Line Cite
		ine 11, 2005	Deposition June 11, 2005		
		ns in italicized text)	(Counter-Designations in italicized		
GBORU	SNATIONS OF ABEL O	XAMINATION DESIG	EFENDANTS' CROSS E	PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU	PLAI
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		Page/Line Cite Defendants' Objections and Counter-Designations	
		Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	(Counter-Designations in italicized text) Deposition June 11, 2005
156:10	156:6-7	Defendants* Cross Examination	ns in italicized text) 1 ne 11, 2005
This designation is beyond the scope of plaintiffs' direct designation, irrelevant and a waste of time.	This designation is beyond the scope of plaintiffs' direct designation, irrelevant and a waste of time.	Plaintiffs' Objections and Counter- Designations	
This testimony describes the witness' visit to Parabe during the incident and is wholly within the scope of plaintiffs' direct on the same topic. See e.g., 76:10-12; 76:19-22.	This testimony describes the witness' visit to Parabe during the incident and is wholly within the scope of plaintiffs' direct on the same topic. See e.g., 76:10-12; 76:19-22. It is not cumulative.	Defendants? Responses to Plaintiffs' Objections and Objections to Counter-Designations	

Page/Linc Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
					It is not cumulative.
			156:14-17	This designation is beyond the scope of plaintiffs' direct designation, irrelevant and a waste of time.	This testimony describes the witness' visit to Parabe during the incident and is wholly within the
				N. K.	topic. See e.g., 76:10-12; 76:19-22. It is not cumulative.
			156:25-157:3	This designation is beyond the scope of plaintiffs' direct designation, irrelevants	This testimony describes the witness' visit to Parabe during the incident and is
				and a waste of time	wholly within the scope of plaintiffs' direct on the same tonic. See e.g.,

Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross Examination	Plaintiffs' Objections and Counter- Designations
			184:18-185:1	This designation is
				beyond the scope of
				plaintiffs' direct
				and a waste of time.
				This designation also
				makes no sense without
				context, but plaintiffs
				do not want to
				designate the context
				because it is cumulative
				irrelevant and a waste
				of time.
			-	
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		- 10
		Page/Line Cite
		Defendants' Objections and Counter-Designations
		Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations
185:4-9		Defendants' Cross Examination
This designation is beyond the scope of plaintiffs' direct designation, irrelevant and a waste of time. This designation also makes no sense without context, but plaintiffs do not want to designate the context because it is cumulative of previous testimony, irrelevant and a waste of time.		Plaintiffs' Objections and Counter- Designations
This designation concerning the witness' ability to hear events on the Parabe platform over the noise from the helicopter is well within the scope of plaintiffs' direct, which inquires into the details surrounding this witness' visit to Parabe by helicopter during the incident. It is closely related to many of plaintiffs' designations	subject and is relevant.	Defendants? Responses to Plaintiffs' Objections and Objections to Counter-Designations

Page/Line Cite PLAINTIFFS' DIRECT AND DEFENDANTS' CROSS EXAMINATION DESIGNATIONS OF ABEL OGBORU and Counter-Designations Defendants' Objections Plaintiffs' Responses to Defendants' Objections Counter-Designations and Objections to (Counter-Designations in italicized text) Deposition June 11, 2005 Defendants' Cross Examination Plaintiffs' Objections and Counter-Designations subject and is relevant. Counter-Designations Plaintiffs' Objections and Objections to Responses to Defendants'